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Cook County Health and Hospitals System

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARTIN KURTEV and IZABELA
DEBOWCZYK, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

COOK COUNTY HEALTH & HOSPITALS
SYSTEM, and PERRY JOHNSON &
ASSOCIATES, INC.,

Defendants.

CASE NO. 2:23-cv-01905

**STIPULATION TO EXTEND
DEFENDANT COOK COUNTY HEALTH
AND HOSPITALS SYSTEM'S DEADLINE
TO RESPOND TO COMPLAINT**

TO THIS HONORABLE COURT, TO THE CLERK OF THE UNITED STATES
DISTRICT COURT FOR THE DISTRICT OF NEVADA, AND TO ALL PARTIES THROUGH
THEIR COUNSEL OF RECORD HEREIN:

Pursuant to Federal Rule of Civil Procedure, Rule 6(b) and Local Rule 6-1, Plaintiffs
Martin Kurtev and Izabela Debowczyk, on the one hand, and Defendant Cook County Health and
Hospitals System ("CCH") on the other hand, stipulate to an extension of time for CCH to respond
to Plaintiffs' complaint in this matter.

Plaintiffs filed their complaint on November 17, 2023, and served CCH on December 11,
2023. CCH's response is due on January 1, 2024.

1 On or about December 11, 2023, CCH retained Gordon & Rees LLP as counsel in this
2 matter. CCH has requested an extension of time to respond to the Complaint, up to and including
3 January 29, 2024. CCH requires additional time to investigate factual and legal issues and respond
4 to the Motion for Transfer and Centralization filed by certain plaintiffs before the Judicial Panel
5 on Multidistrict Litigation. Counsel for Plaintiffs has agreed to the extension.

6 There does not appear to have been entered a scheduling order in this case; thus, there are
7 no dates set for trial, motions, or discovery.

8 IT IS HEREBY STIPULATED that CCH shall have up to and including January 29, 2024,
9 to respond to Plaintiffs' complaint.

10 **IT IS SO STIPULATED.**

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13 Dated: December 26, 2023

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI

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15 By: /s/ Sean Flynn
Sean Flynn
Attorneys for Defendant
Cook County Health and Hospitals
System

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18 Dated: December 26, 2023

ZIMMERMAN LAW OFFICES, P.C.

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20 By: /s/ Thomas A. Zimmerman, Jr.
Thomas A. Zimmerman, Jr.
Attorney for Plaintiffs *Martin Kurtev*
and *Izabela Debowczyk*

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23 **IT IS SO ORDERED:**

24 **DATED:** December 27, 2023.

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26 **RICHARD F. BOULWARE, II**
27 **UNITED STATES DISTRICT JUDGE**